

#4188
OK

WATER QUALITY M E M O R A N D U M

Utah Coal Regulatory Program

March 7, 2013

TO: Internal File

THRU: Steve Christensen, Permit Supervisor SC

FROM: April A. Abate, Environmental Scientist III AA
3/7/13

RE: 2012 Third Quarter Water Monitoring, Nevada Electric Investment Corporation,
Wellington Preparation Plant, C/007/0012, Task ID #4188

The Wellington Preparation Plant is currently in temporary cessation. No mining or coal processing activities currently take place there. Water-monitoring requirements are in Sections 7.23 and 7.31.2 through 7.31.22, and Tables 7.24-2 and 7.24-5 of the MRP.

1. On what date does the MRP require a five-year re-sampling of baseline water data.

Baseline parameters are collected in the year preceding permit renewal. The next scheduled permit renewal for the Wellington Preparation Plant is November 30, 2014 and therefore, baseline parameters are due to be collected during the 4th quarter of 2013.

2. Were data submitted for all of the MRP required sites?

Streams and Ponds

YES ☒ NO ☐

The Permittee is required to analyze samples from streams at SW-1, SW-2A, SW-3, and SW-4 and from ponds at SW-5, SW-6, SW-7, and SW-8 for the parameters in Table 7.24-5, and to measure flow only at SW-2. Samples SW-4 and SW-5 are to also be analyzed for benzene, toluene, ethylbenzene, xylene, and naphthalene (BTEXN) and propylene glycol. However, a recent permitting action associated with the midterm review eliminated the BTEXN requirements for these samples effective January 2013.

During the third quarter 2012, samples were collected from SW-1 and SW-2A. Flow only was measured from SW-2. None of the other monitoring locations reported flow. None of the pond samples reported any water during this monitoring period.

Wells

YES ☒ NO ☐

The Permittee is required to analyze samples quarterly from GW-1, GW-3, GW-4, GW-6,

GW-7, GW-8, GW-9, GW-9B, GW-10, GW-12, GW-13, GW-14, GW-15A, GW-15B, GW-16, and GW-17 for the parameters in Table 7.24-2, and to measure depth only at GW-2.

GW-3 was reported as dry. Not enough groundwater was found in wells GW-13 and GW-17 to collect a sample. GW-12 was flooded with irrigation water and could not be accessed.

UPDES YES ☒ NO ☐

Six UPDES permitted outfalls at the Wellington Preparation Plant are monitored monthly: #UTG040010-003, 004, 005, 006, 007, and 008. None of the UPDES sites reported flow during the third quarter 2012.

3. Were all required parameters reported for each site?

Streams and Ponds YES ☒ NO ☐

Wells YES ☒ NO ☐

UPDES YES ☐ NO ☐

Not applicable

4. Were any irregularities found in the data?

Streams and Ponds YES ☐ NO ☒

Wells YES ☒ NO ☐

The following table summarizes the parameters that were outside of at least two standard deviations for this quarter:

Well	Parameter	Concentration in mg/L	Std Deviation	Mean mg/L
GW-15B	T-Alk	537	2.29	483.81
GW-8	Bcrb	915	2.04	969.94

These irregularities are typically associated with these two groundwater wells and are not considered significant.

UPDES

YES ☐ NO ☐

Not Applicable. No discharges were reported from any of the UPDES monitoring locations.

- 5. Did the Permittee make a timely submittal of all data, including initially missing data, and satisfactorily explain irregular data?**

YES ☒ NO ☐

- 6. Does the Mine Permittee need to submit more information to fulfill this quarter's monitoring requirements?**

YES ☐ NO ☒

- 7. Follow-up from last quarter, if necessary.**

None

- 8. Based on your review, what further actions, if any, do you recommend?**

The Permittee has updated the Probable Hydrologic Consequence (PHC) document for the Wellington Mining and Reclamation Plan as part of the midterm review. A PHC document was required as part of the submittal due on March 21, 2013.

A new water monitoring protocol has been adopted as of the first quarter 2013. The changes to the plan include eliminating GW-12 as a monitoring well due to nearby groundwater monitoring wells providing adequate representative sampling. In addition, the ponding of irrigation water in the vicinity of this well has been problematic for collecting samples. The removal of the BTEXN parameters from SW-4 and SW-5 has also been approved since those additional analytical parameters were collected for the purpose of analyzing impacts from when the Cool wash plant was operating on the premises.

The Division is planning on conducting routine water sampling observations during the 2013 field season for data quality control purposes. A division hydrologist will be contacting your consultant to set up an appointment to observe a quarterly sampling event at the Wellington facility.